

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

JOE ALEXANDER

Plaintiff,

v.

Case No. 3:19-cv-00688-JAG

DIET MADISON AVENUE, *et al.*,

Defendants.

**PROPOSED INTERVENORS' MOTION FOR PROVISIONAL SEALING,  
OR IN THE ALTERNATIVE, FOR EXPEDITED HEARING**

Proposed Intervenor, The Interpublic Group of Companies, Inc. ("IPG") and The Martin Agency ("Martin") (collectively, "Proposed Intervenor"), by counsel, pursuant to Rules 5 and 7 of the Local Civil Rules for the United States District Court for the Eastern District of Virginia, hereby move for an order sealing, on a provisional basis, the information that is the subject of Proposed Intervenor's *Motion For Leave To Intervene, To Seal Confidential Information and For Protective Order* [Dk. No. 5] ("Motion To Seal"). In the alternative, Proposed Intervenor request the entry of an order establishing an expedited briefing schedule and hearing on the Motion To Seal. The grounds for Proposed Intervenor's motion are set forth more fully in the supporting memorandum filed contemporaneously herewith.

WHEREFORE, Proposed Intervenor respectfully request that their motion be granted; that the Court enter an order provisionally sealing the information that is the subject of the Motion To Seal, or in the alternative, establishing the briefing schedule and an expedited hearing as set forth in Proposed Intervenor's supporting memorandum; and that the Court award any additional relief it deems fair and just.

Date: October 9, 2019.

Respectfully submitted,

THE INTERPUBLIC GROUP OF  
COMPANIES, INC.  
and  
THE MARTIN AGENCY

By Counsel

/s/ David B. Lacy

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*Counsel for Proposed Intervenors  
The Interpublic Group of Companies, Inc.  
and The Martin Agency*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of October, 2019, I will electronically file a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the registered participants as identified on the NEF to receive electronic service, including:

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